

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re:

Alberto Cross aka Alberto Cross, Sr.,* Case No. 12-27927-WIL
* Chapter 13

Debtor *

* * * * * * * * * * * *

Deutsche Bank National Trust *
Company, as Trustee *
c/o Onewest Bank FSB *
Movant *

v. *

Alberto Cross aka Alberto Cross, Sr.,* *

Debtor/Respondent *

and *

Timothy P. Branigan *

Trustee/Respondent *

* * * * * * * * * * * *

**RESPONSE TO MOTION FOR
RELIEF FROM AUTOMATIC STAY**

Now comes the Debtor, through his undersigned attorney, and respond to the Motion for Relief from the Automatic Stay and state:

- 1) The Debtor admits the allegations contained in paragraph 1 of the Motion.
- 2) The Debtor neither admits nor denies the allegations contained in paragraph 2 of the Motion.
- 3) The Debtor admits the allegations contained in paragraphs 3, 4, and 5 of the Motion.
- 4) The Debtor neither admits nor denies the allegations contained in paragraphs 6, 7, 8, 9, 10, and 11 of the Motion.
- 5) The Debtor admits the allegations contained in paragraph 12 of the Motion.
- 6) The Debtor denies the allegations contained in paragraphs 13, 14, 15, and 16 of the Motion.
- 7) The Debtor states a response is not needed for paragraph 17 of the Motion.
- 8) The Debtor neither admits nor denies the allegations contained in paragraph 18 of the Motion.

WHEREFORE, the Debtors request that this Honorable Court deny the Motion.

/s/ Alon J. Nager, Esquire
Alon J. Nager, #28551

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CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 15th day of October 2013 a copy of the foregoing Response to Motion for Relief from Stay was sent via electronic mail to: bankruptcy@bww-law.com, the Chapter 13 Trustee and the Office of the U.S. Trustee located in Greenbelt, Maryland.

/s/ Alon J. Nager
Alon J. Nager